

REMARKS

The Examiner is thanked for the performance of a thorough search. By this amendment, Claims 1, 12, 13-20 have been amended. No claims have been cancelled or added. Hence, Claims 1-20 are pending in the Application. It is respectfully submitted that the amendments to the claims as indicated herein do not add any new matter to this application. Furthermore, amendments made to the claims as indicated herein have been made to improve readability and clarity of the claims.

SUMMARY OF THE REJECTIONS

Claims Rejections – 35 USC § 102

The Examiner rejected Claims 1-12 under 35 U.S.C. § 102(e) as being anticipated by *Hellman et al.* ("*Hellman*") (US 20030163597A1).

Claims Rejections – 35 USC § 103

Claims 13-20 are rejected under 35 U.S.C. § 103(a) as being unpatentable over *Hellman et al.* ("*Hellman*") (US 20030163597A1).

CLAIMS 1-20

The Office Action states that Claims 1-12 are anticipated by *Hellman* and that Claims 13-20 are obvious over *Hellman*. Applicants respectfully disagree. *Hellman* fails to disclose, suggest, anticipate or make obvious Claims 1-20.

Applicants' independent Claim 1 requires "converting information in a first form" into a "second intermediate form." Claim 1 also requires converting the second intermediate form into a "target form". In other words, Claim 1 requires three forms of data, namely, a first form, an intermediate and a target form.

Hellman suggests, at best, only two forms of data, namely, (1) XML Schema and (2) class/relation definitions. In *Hellman*, the first form is converted to the second form, and the second form is converted back to the first form (see ¶¶ 0127, 0070, 0071).

In the Office Action, the Examiner indicates that, in *Hellman*, the "mapping from a web of distributed class and relation definitions to a global ontology model" is a disclosure of "converting the enterprise information in the first form into corresponding information that is in the second form."

It is respectfully submitted that *Hellman's* "mapping from a web of distributed class and relation definitions to a global ontology model" has nothing to do with data conversion of any kind. To explain, in paragraph [0002] in the *Hellman* publication, *Hellman* explains that an ontology model is set of "common dictionaries." "Ontology provides a vocabulary for telling about things that exist." In paragraph [0142] and FIG. 3, *Hellman* proceeds to explain that this set of dictionaries or vocabulary is distributed across an ontology web. Thus, a "global ontology" can be formed by aggregating the various dictionaries that are distributed across the ontology web. Thus, such a mapping from a web of definitions to a global ontology does not involve converting the vocabulary into a different form, but rather aggregating different sets of dictionaries into a single global ontology (see paragraph [0058] of *Hellman*). Such aggregation involves no conversion of one form of data into another as recited. Thus, *Hellman* fails to suggest or even hint at three forms of data.

Further, Claim 1 includes the novel feature where "modifications of the other data structures in the second intermediate form are independent of the

custom data type elements." Assuming *arguendo* that *Hellman* discloses a second intermediate form of data, *Hellman* fails to disclose or suggest any such feature where "modifications of the other data structures in the second intermediate form are independent of the custom data type elements."

Independent Claim 12 contains features similar to those of Claim 1. Therefore, Claim 12 is allowable for at least the reasons set forth herein with respect to Claim 1.

Claims 2 to 11 and 13-20 are directly dependent upon independent Claim 1 and 12, respectively and include all the features of Claim 1 and 12, respectively. Therefore, it is respectfully submitted that Claims 2-11 and 13-20 are allowable for at least the reasons provided herein with respect to Claim 1 and Claim 12. Furthermore, it is respectfully submitted that Claims 2-11, and 13-20 recite additional features that independently render Claims 2-11, 13-20 patentable over *Hellman*.

CONCLUSION

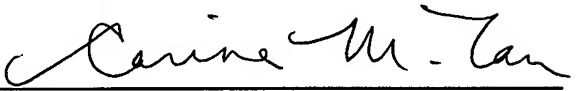
For the reasons set forth above, it is respectfully submitted that all of the pending claims are now in condition for allowance. Therefore, the issuance of a formal Notice of Allowance is believed next in order, and that action is most earnestly solicited.

If in the opinion of the Examiner a telephone conference would expedite the prosecution of the subject application, the Examiner is encouraged to call the undersigned at (650) 838-4311.

The Commissioner is authorized to charge any fees due to Applicants' Deposit Account No. 50-2207.

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